

**MORRISON FOERSTER**

425 MARKET STREET  
SAN FRANCISCO  
CALIFORNIA 94105-2482  
  
TELEPHONE: 415.268.7000  
FACSIMILE: 415.268.7522  
  
WWW.MOFO.COM

MORRISON & FOERSTER LLP  
  
AUSTIN, BERLIN, BOSTON, BRUSSELS, DENVER,  
HONG KONG, LONDON, LOS ANGELES, MIAMI,  
NEW YORK, PALO ALTO, SAN DIEGO, SAN  
FRANCISCO, SHANGHAI, SINGAPORE, TOKYO,  
WASHINGTON, D.C.

November 25, 2024

Writer's Direct Contact  
+1 (415) 268-6025  
VRanieri@mofo.com

**VIA ECF**

Hon. Colleen McMahon  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

Re: *Raw Story Media, Inc., et al. v. OpenAI, Inc., et al.*, Case No. 1:24-cv-01514-CM

Dear Judge McMahon:

I represent Defendants OpenAI, Inc., OpenAI GP, LLC, OpenAI, LLC, OpenAI OpCo LLC, OpenAI Global LLC, OAI Corporation, LLC, and OpenAI Holdings, LLC (collectively, "OpenAI") in this matter. The parties respectfully and jointly request that the Court enter an order modifying and extending the schedule to respond to Plaintiffs' pending Motion for Leave to File a First Amended Complaint (Dkt. No. 118). Plaintiffs filed their motion on November 21, 2024. Accordingly, pursuant to Section V.F. of Your Honor's Individual Practices and Procedures, the current response deadlines are as follows:

- Defendants' response to Plaintiffs' motion: December 5, 2024
- Plaintiffs' reply in support of motion: December 10, 2024

The parties respectfully request that the Court adjust the schedule to the following:

- Defendants' response to Plaintiffs' motion: December 20, 2024
- Plaintiffs' reply in support of motion: January 21, 2025

This is the first request for an extension of the schedule to respond to Plaintiffs' motion. The parties previously requested an extension of the case schedule in light of ongoing discovery. (Dkt. No. 92) The Court granted the joint request. (Dkt. No. 99)

Counsel for the parties have conferred, and all parties consent to this motion. The requested extension does not affect any other scheduled dates because there is currently no operative complaint. The parties appreciate the Court's consideration of their joint request.

**HORRISON FOERSTER**

Hon. Colleen McMahon  
November 25, 2024  
Page 2

Sincerely,



Vera Ranieri  
Of Counsel  
Counsel for OpenAI